

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO THE UNITED STATES POSTAL SERVICE – ERRATA NOTICE
(APWU/USPS-2-7)
(January 27, 2012)

Earlier today Counsel for APWU inadvertently filed an incomplete draft Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service (APWU/USPS-2-7). The attached copy of APWU Interrogatories to United States Postal Service corrects this error and represents the Interrogatories in final form.

Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO THE UNITED STATES POSTAL SERVICE
(APWU/USPS-2-7)
(January 27, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-2 Please confirm that the 2010 USPS/APWU National Collective Bargaining Agreement was effective May 23, 2011.

- a) Please confirm whether any analysis in this docket considered the scheduling flexibility and labor cost savings provided in the USPS/APWU Agreement adjusting the costs of operating the current network before comparing costs of the proposed network? If confirmed, please direct us to or provide the analysis.
- b) Regarding transportation costing, please confirm whether any analysis in this docket considered the new contract provisions on outsourcing initiatives. If confirmed, please direct us to or provide the analysis.

APWU/USPS-3 Has anyone at USPS evaluated the combined impacts on customer service, mail volumes, revenues, and costs of the Mail Processing Network Rationalization Service Changes initiative and the proposed Six-Day to Five-Day Street Delivery and Related Changes? If so, please identify, by name and title, who conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusion.

APWU/USPS-4 Has anyone at USPS evaluated the combined impacts on customer service, mail volumes, revenues, and costs of the Mail Processing Network Rationalization Service Changes initiative and the proposed Retail Access Optimization Initiative. If so, please identify, by name and title, who conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusion.

APWU/USPS-5 Has anyone at USPS evaluated the combined impacts on customer service, mail volumes, revenues, and costs from instituting all the proposed changes in Docket Nos. N2010-1, N2011-1, and N2012-1? If so, please identify, by name and title, who conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusion.

APWU/USPS-6 Assuming the PRC does not issue its decision in this case until August 2012, will the Postal Service implement the Mail Processing Network Rationalize Service Changes Plan before receiving the benefit of the Commission's advisory opinion in this docket?

APWU/USPS-7 If the Postal Service determines not to move forward with its Mail Processing Network Rationalization proposal which is the subject of this docket, does the Postal Service intend to implement the Service Standard changes which are the subject of the Federal Register Notice published December 15, 2011 at 76 *Federal Register* 77942?